REMARKS

1. Claims 1-19 were pending. Claims 1, 5, 6, and 11-16 have been amended. Claims 20-35 have been added. Claims 1-35 are now pending. Reexamination and reconsideration of the application, as amended, are requested.

2. Rejections under 35 U.S.C. § 112 ¶ 2

On page 2 of the Office Action, Claims 1-19 were rejected under 35 U.S.C. § 112 ¶ 2. These claims have been amended to more particularly point out and distinctly claim that which the Applicants regard as their invention. Withdrawal of the rejection is respectfully requested.

3. Rejections under 35 U.S.C. § 102(e) and § 103(a)

Claim 5 was rejected in the Office Action under 35 U.S.C. § 102(e) as being anticipated by Kolling et al. (US Patent No. 5,963,925). Claims 1-4 and 5-19 were rejected in the Office Action under 35 U.S.C. § 103(a) as being unpatentable over Kolling et al. (US Patent No. 5,963,925). The Applicants respectfully traverse the rejections and request consideration of the following.

4. For a better understanding of the present invention, we review Figure 5 and its description in the specification, at page 18, lines 4-21, as follows:

> The BIS gateway 80 has a parcel manager 134 to transfer billing data and other information from the BIS to the service center. The parcel manager transfers the data in "parcels". The parcel manager 134 is responsible for reliably transferring parcels from the BIS 34 to the service center and tracking the parcels as they go from computer to computer. It is this tracking function that enables the management console UI 100 to show the location and status of particular parcels. The parcel manager 134 is described below in more detail with reference to Fig. 7. Atop the parcel manager 134 are a set of handlers that collectively form an enterprise interface into the parcel manager. The interface handlers handle ***requests to create different types of parcels, depending upon the type of information being transferred*** to the service center. The enterprise interface handlers include a consumer information handler 136, a payment handler 138, a batch handler 140, and a template handler 142. The handlers facilitate ***creation of particularized parcels for shipment*** to the service center. For instance, the batch handler 140 facilitates creation of statement batch parcel to be transferred to the service center. The handlers 136-142 are preferably implemented as COM (component object model) objects and are called via a set of enterprise integration APIs. (emphasis added)

At page 19, lines 4-7, it is disclosed, in comparison with biller gateway 80 that "[t]he service center gateway 86 has essentially the same modules, including * * * a consumer information handler 156, a payment handler 158, a batch handler 160, and a template handler 162."

As such, parcels can be created at both the biller gateway and the service center gateway.

5. **Requests, Interface Handlers, and Parcels Are Particular To Data Type**

The foregoing text presents the concept of particularization of the parcel contents. As designed, each parcel is to be limited as to its content. This limitation placed upon the content of the parcel is dictated by a request. The request is for a particular data type and is directed to a particular type of interface handler. The particular interface handler to which a particular request is directed is responsible for the requested particular type data in the particular type of parcel. As such, Applicants provide for a particular type of interface handler to assemble a particular type of parcel to be made up of a particular type of data. The application provides for at least four (4) particular types of data: consumer information, payment, statement batch, and template. As such, the Applicants' disclosed technology provides for:

(i) at least four (4) different kinds of data;
(ii) at least four (4) different kinds of requests;
(ii) at least four (4) different kinds of interface handlers; and
(iii) at least four (4) different kinds of batch-types.

Importantly, the functionality for this degree of particularization of data, requests, interface handlers, and batches is provided at both the biller gateway and the service center gateway.

6. **Packet Switched Network Traffic vs. Applicants' Particularized Parcels**

The Office Action, at Page 4, takes Official Notice that:

> it is well known to bundle data into packets in order to facilitate the transfer of data from one computer to another.

Packetized network traffic is indeed well known. Official Notice can be taken from documentation of the Transport Layer. The Transport Layer is one of the network functionality layers in Open Systems Interconnect (OSI) standards and also in the TCP/IP standards. The Transport Layer has the responsibility for packetizing application data and then initiating the transporting of the packet over a packet switched network using a transport protocol, such as TCP, UDP, etc. The specific packaging of data in a packet switched network dependents upon the type of network.

Each packet on a packet switched network normally has a specific and fixed length, a header containing control information, a data payload, and a trailer for error detection and correction. Since the purpose of the packetizing process is to efficiently transfer data across a network, the data payload in the packet is neither specified nor mandated to be limited in composition to any particular type of data.

The Applicants respectfully submit that standards and protocols for assembly of a packet of data that is transported in a packet switched computer network is nonanalgous art to the recited parcel limitation in each of the independent claims, as amended. The parcel limitation of the claimed invention is particular as to the type of data. This limitation is further narrowed to be *recited as being selected from the group consisting of consumer information data, payment data,*

batch statement data, and statement template data. Neither Kolling et al., OSI, nor TCP/IP standardize upon a packet having a data payload that is particularized or otherwise restricted as to its contents.

Since Kolling et al. teach a computer network for communicating electronic statement presentment data, and since Kolling et al. are silent as to packet composition, it must be concluded that Kolling et al. use standard network packetizing protocol, rather than the *claimed particularization of the contents of parcels*. Applicants' disclosed technology can be used over a packet switched computer network, which necessarily involves breaking up the particularized parcels into packets. It does not follow, however, that the data payload each of the packets is restricted or in any way limited by data type. Thus, conventional packets are fundamentally different than the parcels recited in the claims, as amended.

7. The present specification proposes to construct parcels of data, where each parcel is limited to one of at least four different kinds of data. Inherent benefits are realized from this concept. In addition to the direct benefit of the reliable transfer of specifically requested parcels as they go in a network from one computer to another between the biller and the service center, the data traffic on the network is not congested by unrequested data. Network congestion is avoided by the claimed invention in that the data in each parcel is particularly limited to that data that was specifically requested.

8. Kolling et al. do not teach particularly requested and composed parcels of data. The electronic statement presentment systems taught by Kolling et al. do not achieve this benefit of reduced network congestion. Kolling et al. do not teach the recited limitations of the independent claims.

9. In sum, Kolling et al. do not teach, suggest, or imply the combinations of the recited elements in the pending independent claims, as amended. The Applicants respectfully submit that, as to the claims now pending, a *prima facie* case of obvious has not been made out, or in the alternative, the pending claims avoid the rejections. As such, the Applicants respectfully maintain that the pending independent claims are allowable, as are the claims respectively depending therefrom. Accordingly, the present application is in condition for allowance. Reconsideration of the rejections is requested. Allowance of Claims 1-26 at an early date is solicited.

Marked up Version of the Pending Claims Under 37 C.F.R. ∋ 1.121(c)(1)(ii):

Amend Claims 1, 5, 6, and 11-16 as follows and in accordance with 37 C.F.R. ∋ 1.21(c)(1)(ii), by which the Applicants submit the following marked up version only for claims being changed by the current amendment, wherein the markings are shown by brackets (for deleted matter) and/or underlining (for added matter):

1. (Once Amended) A parcel manager for managing transfer of data from a local computer to a remote computer, the parcel manager being embodied on a computer readable medium, and comprising:

an interface object to present an interface into the parcel manager from one or more external applications;

a parcel object created via a first function presented by the interface object, the parcel object providing functionality to place the data in one or more parcel components for transferring to the remote computer, each said parcel component being particularized to contain and carry a particular type of data that was requested; and

a notification object created via a second function presented by the interface object in response to a request from an external application, the notification object providing functionality to track a status of the parcel object as the parcel components are transferred to the remote computer.

5. (Once Amended) In an electronic billing system in which a biller submits billing data to a service center and the service center generates billing statements from the billing data and electronically distributes the billing statements to consumers on behalf of the biller, a parcel manager comprising:

a transfer and tracking object executing on a biller computer system to manage the transfer of the billing data in a plurality of parcel components to the service center and to track status of the billing data as it is transferred; and

a parcel component creation object to create the plurality of parcel components, each said parcel component being particularized to contain and carry a particular type of billing data.

6. (Once Amended) A biller integration system, which interfaces with an existing billing system of a biller, comprising:

a translator to convert billing data from the biller's existing billing system to a particular format;

a statement designer to create a statement template for visually presenting the billing information in a customized arrangement that is determined by a biller;

a gateway to facilitate transfer of the statement template and the billing data to a billing service center and to monitor status of the statement templates and the billing data as they are transferred; and

a parcel manager implemented as part of the gateway, the parcel manager:

creating a parcel to carry the statement templates and billing data, wherein the created parcel is particularized to contain and carry a particular type of data; and

generating notifications to provide the status of the parcel as it is transferred.

11. (Once Amended) In an electronic system for transferring data from a local computer to a remote computer, a software program embodied on a computer readable medium for execution on the local computer, the software program presenting an application program interface to handle requests for services from an external application, the application program interface being responsive to separate commands to perform [the following] services comprising:

creating a new parcel to carry the data from the local computer to the remote computer, wherein the created new parcel is particularized to contain a particular type of data;

searching a group of parcels according to a date;

searching the group of parcels according to a state;

searching the group of parcels according to parameters supplied by the external application;

locating a particular parcel from the group; and

initiating a notification service that supports a monitoring function to track the parcel as it is transferred from the local computer to the remote computer.

12. (Once Amended) In an electronic system for transferring data from a local computer to a remote computer, a software program embodied on a computer readable medium for execution on the local computer, the software program having a parcel object that is responsive to separate commands to perform [the following] services comprising:

creating a parcel component to hold at least part of the data to be transferred from the local computer to the remote computer, wherein the created parcel component is particularized to

hold a particular type of data;

sending one or more of the parcel components to the remote computer;

creating a bulletin to hold status information regarding transfer of the parcel components;

searching a group of bulletins according to a date;

searching the group of bulletins according to a state;

locating a particular bulleting from the group; and

receiving a parcel component from the remote computer.

13. (Once Amended) In an electronic system for transferring data from a local computer to a remote computer, a software program embodied on a computer readable medium for execution on the local computer, the software program having a bulletin object that is responsive to separate commands to perform [the following] services comprising:

specifying a type of a bulletin, the bulletin being used to hold status information regarding transfer of the parcel components, wherein each of the parcel components is particularized to contain a particular type of data;

designating a pointer to detail information for the bulletin;

sending the bulletin to the remote computer; and

receiving the bulletin from the remote computer.

14. (Once Amended) In an electronic system for transferring data from a local computer to a remote computer, a software program embodied on a computer readable medium for execution on the local computer, the software program having a notification object that is responsive to separate commands to perform [the following] services comprising:

awaiting information concerning creation or arrival of a parcel used to carry the data between the local and remote computers, wherein the parcel is particularized to contain a particular type of data;

designating parcel events of which the status is requested; and

updating a status on the parcel.

15. (Once Amended) A method for managing transfer of data from a local computer to a remote computer, comprising the following steps:

receiving a request to transfer data at a parcel manager application program interface;

creating a parcel object to hold the data via a function of the parcel manager application program interface, wherein the created parcel object is particularized to hold a particular type of data;

creating a notification object via a second function of the parcel manager application program interface; and

tracking, via the notification object, a status of the parcel as the parcel components are transferred to the remote computer.

16. (Once Amended) A method as recited in claim 15, further comprising the step of creating one or[e] more parcel component objects to hold the data via a function of the parcel object.

10. In the event that the Examiner finds any remaining impediment to a prompt allowance of this application, which could be clarified by a telephonic interview, the Examiner is respectfully requested to initiate the same with the undersigned attorney.

Dated this 26 day of July, 2001.

Respectfully submitted,

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